
The Norfolk County Council (Norwich Northern Distributor Road (A1067 to A47(T))) Order

Applicant's comment on Written Representations by Richard Hawker

Planning Act 2008

Infrastructure Planning

The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009

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Introduction

This document provides the Applicant's responses in respect of selected issues raised by Richard Hawker in his Written Representation to the Examining Authority dated 3 July 2014. The Written Representation covers many issues. Some of these have been addressed elsewhere (including the Applicant's comments on Relevant Representations, and the Applicant's comments on other Written Representations). Therefore a limited selection of issues raised have been extracted and comments provided.

The points have been responded to where possible in the order they were raised. Each issue, or in some cases a summary of it, is shown in italics.

Applicant's comment on Written Representations

Representation

- 1.1. *It is clear that if the NDR is to achieve one of its stated aims, it must attract traffic to it, and this inevitably means that more traffic will exit or join the road at its junction with the A1067. That traffic will mostly go through the Hockering area, and probably past my house.*

Applicant's comment

- 1.1.1. The forecasts of traffic to the west of Norwich crossing the Wensum valley are set out in the Traffic Forecasting Report (Document Ref. 5.6) in paragraphs 7.1.8-7.1.14 and in Table 7.1. Whilst traffic flows across an imaginary screen line along the Wensum Valley are forecast to reduce with the NDR by 6% in 2017 and 4% in 2032, it does show that there would be an increase in the western corridor on the C167 through Weston Longville and C173 between Lenwade and Hockering. However this issue has been addressed as described below to avoid impacts on the local settlements.
- 1.1.2. Norfolk County Council's Cabinet resolved on 19 September 2005, to have no NDR link between the A1067 and A47 and to also pursue a separate scheme to address existing local issues between Hockering and Lenwade. On the 9 November 2009 Norfolk County Council's Cabinet agreed to undertake works to progress a route improvement scheme that also included the introduction of HGV restrictions in Hockering, reclassification of the route to a B road and in the longer term to consider improvements to the junctions with the A47 and A1067 and the northern section of the route when funding permits.

- 1.1.3. The improved route between the A1067 and the A47 addresses previous HGV problems by diverting HGVs away from the villages of Weston Longville and Hockering. The route improvement works have been completed, with reclassification of the road to a B road and an accompanying HGV ban to be implemented in Hockering in 2014.
- 1.1.4. Marl Hill Road leads onto Church Street, which has a 6' 6" width restriction (restriction runs from Morton Lane/Ringland Lane through Weston Longville to Rectory Road) and a 7.5T Gross Vehicle Weight restriction (restriction runs from Morton Lane/Ringland Lane through Weston Longville to just north of Wood Lane/Walnut Tree Lane). This means HGVs should already use Weston Hall Road. The aim is to deter other vehicles and light goods vehicles from using Marl Hill Road and traffic will be signed to use the new B road from the A1067.

Representation

- 1.2. *I was not informed about the latest round of consultation, though I have registered a personal objection to the road plans in the past.*

Applicant's comment

- 1.2.1. Section 56 of the Planning Act 2008 outlines how and who NCC is required to notify regarding the acceptance of the DCO application and that it will be moving forward to examination. In accordance with this section of the Planning Act 2008 NCC placed a Section 56 Notice in both local (on 14 and 21 February 2014) and national newspapers (on 14 February 2014) and sent a copy of this notice to:
- local authorities, the Planning Act 2008 states that the local authorities (both at County and District level) to be notified are those through which the NDR passes together with their neighbouring authorities,

- prescribed consultees, the list of these being identified by The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009,
- those with a interest in land affected by the NDR.

Representation

1.3. *Road-building is surely against all the principles of 'green energy' which the government is encouraging us to follow.*

Applicant's comment

- 1.3.1. The overall transportation strategy for the Norwich area, NATS, is a package of transport improvements, interventions and measures. Together these will deliver a reliable, efficient and long-term sustainable transport network which will improve travel choices accessibility and connectivity and which will support the continued economic and physical growth of the Norwich area.
- 1.3.2. The NDR is an integral part of NATS and is required to address existing problems and issues which include an Outer Ring Road operating at near capacity or overcapacity around the northern part of the city.
- 1.3.3. The ES - Volume 1, Chapter 5 (Document Ref 6.1) examines the emissions of carbon arising from the NDR. The construction phase of the Scheme will lead to a one-off carbon emission from the use of construction materials, plant and transport. Mitigation measures have been included in the Scheme design, which reduce overall emissions from construction by 13.8kt CO₂ .

- 1.3.4. Carbon emissions during the operational phase of the Scheme will occur as a result of an increase in vehicle kilometres. Changes in absolute emissions will represent around 1% of the total emissions from all sources within the relevant Local Authorities in the assessment years. Carbon sequestration will increase as the habitat creation and landscaping matures.

Representation

1.4. *It is clear that if the NDR is to achieve one of its stated aims, it must attract traffic to it, and this inevitably means that more traffic will exit or join the road at its junction with the A1067.*

Applicant's comment

- 1.4.1. Vol 1 Section 7 Paragraph 7.1.8 to 7.1.14 of the Traffic Forecasting Report (Document Ref. 5.6) analyses the traffic impacts at the western end of the NDR in the vicinity of Taverham and Drayton and especially the impact on traffic crossing the Wensum Valley.
- 1.4.2. This shows that the NDR leads to a decrease in daily traffic on the routes that connect the A1067 with the A47(T) to the west of Norwich of 6% in 2017 and 4% in 2032 as shown in Table 7.1, although there is an increase in traffic on the western part of the corridor (between Lenwade / Weston Longville and Hockering) which has, separately to the NDR project, already received highway and traffic management improvements. (Further details on this have been provided in response to ExA first Written Questions 10.10.)
- 1.4.3. In Figure I.3 in Vol3 of the Traffic Forecasting Report site A54 shows there would be a forecast reduction with the NDR on the A1067 Fakenham Road.

Representation

1.5. *Norwich is a very attractive city, with great historical and commercial interest. It already has plenty of large roads: the inner and outer ring roads, and the A47 Southern By-pass. If any more are built, Norwich is in danger of becoming just another large, sprawling city, slowly eating up with 'infill development' the green land on its outskirts which contributes so much to its attraction. I question whether such expansion of the city is desired or needed.*

Applicant's comment

- 1.5.1. The economic development impact of NDR is set out in Document Ref. 10.3. The economic impact assessment of the proposed NDR is provided within the context of the JCS stated growth targets which are in place to guide the future of the Greater Norwich economy. The NDR is a key strategic piece of infrastructure and will play a key role in supporting the delivery of growth in housing and jobs over the next two decades.
- 1.5.2. The amount of development and the general location of development for the Greater Norwich area are detailed in the adopted JCS, the key adopted element of the development plan for Norwich and its surrounding area. This has been found to be sound following independent examinations of that strategy; most recently in 2013. As explained in paragraphs 2.11.2 to 2.11.9 of Volume 1 of the ES (Document Ref 6.1) the NDR scheme is identified as infrastructure which is fundamental to the achievement of the strategy in the JCS.

- 1.5.3. The JCS is the adopted strategy for the area and sets out the broad distribution type and scale of growth. It emphasises the need for the NDR as Priority 1 infrastructure as well as providing the spatial strategy for the area encompassing the city centre, the rest of the urban area and surrounding areas including market towns in Broadland and South Norfolk. The views of surrounding areas such as North Norfolk and Great Yarmouth were taken into account through the consultation process and more recently through the duty to co-operate. The JCS is evidenced based and subject to sustainability appraisal which includes economic considerations.
- 1.5.4. Norwich is a dominant regional city located within a largely rural county. As explained in Chapters 2 and 3 of Volume 1 of the ES (Document Ref 6.1) a number of objectives which centre on substantial population growth and economic development have been identified for the City of Norwich and its surrounding area. As explained in paragraphs 3.3.20 to 3.3.34 of Volume 1 of the ES (Document Reference 6.1), at the local level these objectives have been largely identified within the adopted JCS. As paragraphs 3.3.35 to 3.3.46 of Volume 1 of the ES further explain, these objectives benefit from support at the national level.
- 1.5.5. The purpose of the Land Use and Economic Development Report (Document Ref 10.3) is to provide an explanation of the relationship between the proposed NDR and sites earmarked for development and to assess the economic development impact of the NDR in terms of jobs and dwellings which are assessed on a site-by-site basis with respect to the influence of the NDR on bringing development forward. The report quantifies the economic benefits of the development sites located on or close to the line of the NDR and provides a qualitative assessment of wider economic effects, including within Norwich City Centre and at Great Yarmouth and the market towns of Aylsham and North Walsham. Positive (but unquantified) effects are identified for these areas in Table 5.2 of the report.

Representation

1.6. *The huge cost of the road could be better spent on improving public transport, (if it must be spent on transport) or on, amongst others, improving the social services, police and libraries, which are continually having to be cut, to the great detriment of the sick, elderly and their carers.*

Applicant's comment

- 1.6.1. Cabinet Report 4 Nov 2013 (Appendix D) sets out that the total cost of the scheme is £148.55m and that the county council will underwrite £60.34m of this, with £40m committed in principle from the GNDP. The adopted Joint Core Strategy identifies in Appendix 7 a range of infrastructure to support planned growth. Through the Greater Norwich City Deal Agreement that has been reached between the local authorities in the area, to pool Community Infrastructure Levy (CIL) and put this towards a programme of strategic infrastructure. The strategic infrastructure programme includes NDR, Green Infrastructure, sustainable transport, education and other important infrastructure required for the development of the area. The NDR is an important element of infrastructure to support the growth plans and allows the full range of sustainable transport interventions to be put in place. Having an agreed programme of strategic infrastructure allows decisions to be made so that the full programme can be delivered in a timely fashion, all of which is important to support planned growth.
- 1.6.2. The County Council cannot spend government funding allocated to the NDR on other projects including social services, police and libraries.